

Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850

June 27, 2003

Leon Blashock, District Ranger
Allegheny National Forest
Marienville Ranger District
HC 2, Box 130
Marienville, PA 16239

Dear Mr. Blashock:

This responds to your letter of March 4, 2003, requesting our review of the Painter Run Windthrow Salvage Project Biological Assessment (BA) and Environmental Assessment (EA). The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of endangered and threatened species.

On June 1, 1999, the Fish and Wildlife Service issued a programmatic biological opinion (BO) regarding the impacts of forest management and other activities that would be implemented under the 1986 Land and Resource Management Plan (Forest Plan) for the Allegheny National Forest (ANF). The Service's programmatic BO evaluated the effects of Forest Service management program activities, including timber management, on the bald eagle (*Haliaeetus leucocephalus*), Indiana bat (*Myotis sodalis*), clubshell mussel (*Pleurobema clava*), and northern riffleshell mussel (*Epioblasma torulosa rangiana*).

In the BO, we determined that the implementation of projects predicated upon the Forest Plan is not likely to jeopardize the continued existence of the bald eagle, Indiana bat, or clubshell mussel. We also determined that implementation of the Forest Plan and most projects predicated upon it (with the exception of boating facility operation) is not likely to jeopardize the continued existence of the northern riffleshell. A jeopardy determination was made for the operation of boating facilities with respect to the northern riffleshell mussel, and reasonable and prudent alternatives were identified to avoid jeopardy to this species.

Although the Service has provided a BO to the Forest Service for the ANF Forest Plan, the Service will review, as they are developed, site-specific projects that the Forest Service determines "may affect" federally listed species. The Service will determine if any effects will occur as a result of a site-specific project in a manner, or to an extent, not evaluated or previously disclosed and discussed in the Service's BO. We consider this site-specific project analysis to be "Tier 2" of the consultation process, with the programmatic consultation (and resulting BO) constituting the "Tier 1" consultation. Our project-specific (Tier 2) consultations will focus on: 1) compliance with the reasonable and prudent measures and associated terms and

conditions in the programmatic BO; 2) consistency with the scope and effects previously analyzed in the programmatic BO; 3) project-specific incidental take vs. take estimated in the programmatic BO; and 4) project-specific reasonable and prudent measures and associated terms and conditions (i.e., for non-jeopardy determinations). In the event of a “may affect” but “not likely to adversely affect” determination for a specific project that is consistent with the programmatic BO, no further evaluation by the Service is necessary and section 7(a)(2) consultation will be considered complete for that project (e.g., via a concurrence letter documenting the conclusion of informal consultation).

We have reviewed the information contained in the Painter Run Windthrow Salvage Project BA, which describes the potential effects of the proposed project on federally listed species. The proposed project type (i.e., timber harvesting) and its effects were discussed and evaluated in the Forest Plan BA and BO. Therefore, this consultation qualifies as a “Tier 2” consultation under the BO.

Forest Service Effect Determinations

The Forest Service initially determined that the federally listed Indiana bat, bald eagle, and small- whorled pogonia (*Isotria medeoloides*) could occur in the project area. Based on surveys, and further assessment of the potential effects of this project on listed species, the Forest Service reached a “no effect” determination for the small-whorled pogonia; a “may affect, not likely to adversely affect” determination for the bald eagle; and a “may affect, likely to adversely affect” determination for the Indiana bat. You requested our concurrence with these effect determinations. Based on our review of the BA and BO, our comments on your determinations follow.

Bald Eagle

Although potentially suitable nesting and roosting habitat for bald eagles is present, no bald eagle nesting, roosting, or foraging has been documented in or near the project area (BA, p. 30). In addition, the proposed project will not alter potentially suitable habitat (BA, p. 32); and tree removal will occur during the winter, thereby avoiding any potential disturbance to nesting or foraging eagles during the breeding season (BA, p. 31). Based on this information, a “no effect” determination is appropriate.

Small-whorled Pogonia

The project area was surveyed in July and August of 2001; however, no small-whorled pogonias were found. Considering the results of this survey, we concur with the Forest Service’s “no effect” determination.

Indiana Bat

The Forest Service determined that implementation of this project “may affect, is likely to adversely affect” the Indiana bat. Given the nature of activities associated with the proposed project, we concur with your determination that incidental take of Indiana bats is possible (although not probable) within the analysis area. As described in the Service’s BO, we believe that adverse effects are likely to occur to the Indiana bat from harvesting or tree removal under the Forest Service’s management program activities. However, based on the implementation of reasonable and prudent measures and associated terms and conditions from the BO, and the conservation measures proposed with the Painter Run Windthrow Salvage Project that will minimize the impact of any incidental take, we have concluded that activities associated with the Painter Run Windthrow Salvage Project will not result in adverse effects to the Indiana bat beyond those that were previously disclosed and discussed in the Service’s BO.

The following Tier 2 biological opinion is based on potential effects to the Indiana bat from the removal of suitable habitat during timber harvesting and gravel pit expansion associated with the Painter Run Windthrow Salvage Project area. This Tier 2 BO identifies the incidental take anticipated due to implementation of the Painter Run Windthrow Salvage Project (Alternative 2), and the cumulative total of incidental take which has occurred (Table 2).

Description of the Proposed Action

In June 2001, a thunderstorm accompanied by high winds caused numerous trees within the project area to become windthrown or damaged. These trees occur as scattered individuals, in clumps, and in concentrated patches (BA, p. 2). “Windthrown” refers to trees that either lie on the ground or are tipped at an angle of 45 degrees or greater from vertical (EA, p. 1). The purpose of this project is to salvage windthrown and hazard trees for their economic value, and to reduce fire and safety hazards (EA, pp. 2-3).

The proposed project involves salvage timber harvesting, reforestation practices (fencing), wildlife habitat improvement activities, and road maintenance within the Painter Run Windthrow Salvage Project area (Table 1, p. 4 of the BA), which is located in Millstone and Spring Creek Townships, Elk County, Pennsylvania. The project area includes approximately 321 acres of National Forest System lands.

Three alternatives were assessed in the BA. The Forest Service has selected Alternative 2 as the preliminary preferred alternative; therefore, this biological opinion focuses on the effects expected due to implementation of this alternative. Timber harvest activities associated with Alternative 2 that may result in incidental take of the Indiana bat are detailed in Table 1. In total, 175 acres are proposed to be treated over a 2-year period.

In addition to timber management activities, Alternative 2 includes expansion of a gravel pit to support road maintenance activities. The gravel pit expansion will affect one acre of forested habitat, which could be potential foraging and roosting habitat for the Indiana bat.

Table 1. Activities which may contribute to take of Indiana bats (Alternative 2).

Activity	Take Category from Programmatic BO	Type of Harvest	Acres Affected
TIMBER HARVEST			
salvage harvest resulting in final harvest conditions	shelterwood removal	salvage, final	13
salvage harvest resulting in single-tree and group selection canopy conditions	selection cut	salvage, partial	161
ROAD ACTIVITIES			
gravel pit expansion	road maintenance	-	1
TOTAL ACRES OF FOREST AFFECTED			175

All the above activities will affect a total of 175 forested acres, and are therefore counted toward the cumulative annual incidental take as outlined in Table 6 (p. 67) of the programmatic BO. The types of timber harvest activities proposed were described on pages 7-8 of the programmatic BO, and the effects of timber harvesting on the Indiana bat were discussed on pages 46 and 65 of the programmatic BO. Road construction activities were described on page 9 of the programmatic BO, and were analyzed on pages 47-48 of the programmatic BO.

The Forest Service has proposed to implement the following project conservation measures (summarized from the BA, pp. 15-16), based on the presence of suitable Indiana bat habitat in the project area, and the assumption that the habitat is occupied by this species.

- C Conduct all salvage operations between October 1 and March 31, when Indiana bats are hibernating or concentrated near their hibernacula.
- C Retain all shagbark and shellbark hickories (live, dead and dying), regardless of size, in partial and final harvest cutting units (green and salvage units).
- C Retain 4-6 live den trees per acre. Where an inadequate number of live trees occur, retain older, larger trees, especially those with old wounds and broken limbs.
- C Mark for retention a clump approximately 1/4 acre in size for every 5 acres harvested. Where possible, clumps of trees in a variety of sizes should contain any or all of the following: den trees, snags, oak/hickory, conifers, minority, and/or mast trees. The Forest Service will protect these clumps and note the clumps on the sale area map.

- C For both partial and final harvests in salvage units (dead or dying trees make up 50 percent or more of the harvested volume), and clearcuts, retain at least 5-10 snags \$9 inches d.b.h. per acre, and of these one snag \$16 inches d.b.h. per two acres. Also retain at least 16 live trees \$9 inches d.b.h. per acre, and 3 live trees \$20 inches d.b.h. per acre in partial harvest units; and retain at least 8-15 live trees \$9 inches d.b.h. per acre, and 1 live tree \$20 inches d.b.h. per acre in final harvest units and clearcuts.
- C Live residual trees to be retained will be Class 1 or Class 2 trees (Romme *et al.* 1995), or other trees exhibiting or likely to develop characteristics preferred by Indiana bats (e.g., exfoliating bark).
- C Designate and retain living residual trees in the vicinity of 1/3 of all large diameter snags (\$12 inches) with exfoliating bark to provide them with partial shade in summer.
- C Protect all known roost trees until they no longer serve as a roost.
- C Reinitiate consultation if a maternity roost is located in or within 1.5 miles of the project area.

All remaining proposed activities associated with Alternative 2 are not expected to remove suitable Indiana bat habitat, or result in direct or indirect effects on, or take of, the Indiana bat. These activities include: 1) 57 acres of fencing; 2) 8 acres of wildlife habitat improvement via rehabilitation and seeding of gravel pits; 3) 1.6 miles of road maintenance; and 4) 1.8 miles of roadside brushing for improved visibility and safety.

Status of the Species

Species description, life history, population dynamics, status and distribution of the Indiana bat are fully described on pages 21 to 36 of the programmatic BO, and are hereby incorporated by reference. New information on the status of the Indiana bat obtained since the Forest Plan and programmatic BO follow.

A biennial survey was conducted on Indiana bat Priority I hibernacula since the issuance of the Service's programmatic BO. Approximately 102,870 Indiana bats were counted during surveys conducted in 2000 and 2001. This compares to the 115,885 Indiana bats that were estimated in 1999 at the same locations (Richard Clawson, Missouri Department of Conservation, *in litt.* 2001 -- as presented at the Indiana Bat Symposium held in Lexington, Kentucky, March 29-31, 2001).

In Pennsylvania, an Indiana bat hibernaculum was located in January of 2000 in an abandoned limestone mine in Armstrong County, approximately 50 miles southwest of the ANF. During a survey of the mine, 67 Indiana bats were located; however, additional surveys of this extensive mine system are needed to determine the extent of this wintering Indiana bat population. Another Indiana bat hibernaculum was recently located in Lawrence County (southwest of the ANF). A survey of this abandoned limestone mine in 2001 revealed the presence of 21 Indiana bats. In February of 2001, the Pennsylvania Game Commission documented the presence of 604 Indiana bats at the Canoe Creek mine in Blair County, approximately 75 miles southeast of the ANF.

Terms and conditions from the programmatic BO (p. 73-75, item 5), describe monitoring procedures for the Forest Service to use to determine use of the ANF by Indiana bats. From 1998-2002, 186 sites were surveyed (i.e., mist-netted) for bats on the ANF (Brad Nelson, ANF, personal communication; November 19, 2002). Many of these sites were also sampled using Anabat detectors. The mist net survey protocol from the draft Indiana Bat Recovery Plan has been used, and in some cases, sampling efforts exceeded those outlined in the protocol. One male Indiana bat was captured in 1998, and another male Indiana bat was captured and radio-tagged in 2001.

Between 1998 and 2001, potential Indiana bat vocalizations were detected at 19 of 125 sampling sites. Positive detection of bats with this equipment could form the basis of a presumption of Indiana bat presence. Recent studies indicate that the echo-location calls of Indiana bats can be distinguished from other *Myotis* bats. While the system definitely shows promise, it still requires substantial development before it can reliably determine whether Indiana bat vocalizations were detected. At this time, the Service does not believe that this technique alone (i.e., without positive mist-net survey results) is sufficient to determine whether Indiana bats are present in a project's action area.

Other mist-netting efforts in and near the ANF included a survey conducted in 2001 in association with a proposed natural gas pipeline project. During that survey effort, mist-netting was conducted at 100 sites along the proposed pipeline right-of-way, which extends from the Pennsylvania-Ohio State line in Lawrence County (near the North Fork Little Beaver Creek) east to Clinton County, Pennsylvania (near the town of Tamarack). The pipeline goes through portions of Lawrence, Butler, Armstrong, Clarion, Jefferson, Elk, Forest, McKean, Cameron, Potter, and Clinton Counties, Pennsylvania. Portions of McKean, Forest, and Elk Counties occur within the ANF proclamation boundary. Out of the 100 sites surveyed, 12 survey sites were located within the ANF. No Indiana bats were captured at any of the survey sites.

Environmental Baseline

The environmental baseline for the ANF was established and described on pages 7-12 and 42-44 in the programmatic BO. Since issuance of the BO, the environmental baseline on the ANF has changed as follows.

Factors Affecting the Species' Environment (on the ANF)

The percentage of trees in the 90 years and older age classes has increased, and includes a 6.8% increase in trees in the 90-109 year old age class and an increase of 9.6% in trees 110 years and older. Conversely, trees in the 60-89 year age class have decreased by 4.3%. Additionally, there has been a decrease of 9.9% in trees in the 20-59 year age class and a 2.1% decrease in under-stocked savannahs and openings. Stands in the 0-19 year age class have increased slightly (0.2%). Other changes relate to a decrease in timber harvest between 1998 and 2001. The average timber harvest on the ANF has decreased from an average annual harvest of 7556 acres between 1986 and 1997, to 2557 acres between 1998 and 2001. This represents a 66% reduction in timber harvest since 1997.

Although the amount of timber harvest has been reduced in the last four years, the mix of timber harvest practices has remained relatively unchanged. Of the 2557 acres harvested annually on the ANF between 1998 and 2001, an annual average of 789 acres (31%) involves thinning and salvage treatments, 175 acres (7%) includes uneven-aged management (i.e., group and individual tree selection), and 902 acres (62%) were associated with even-aged regeneration harvest techniques (e.g., shelterwood seedtree harvest, removal cutting and clear-cutting). Although the amount of timber harvest has been reduced since 1997, reforestation treatments have not changed appreciably. Since 1998, the average annual amount of reforestation (herbicide application, site preparation, TSI, fencing, planting, fertilization, release) that has occurred on ANF has been 4818 acres. The average annual amount was 4469 acres between 1986 and 1997.

Activities that benefit wildlife such as prescribed fire, tree and shrub planting, opening construction, and shrub and tree release have decreased from an average annual amount of approximately 2200 acres between 1986 and 1997, to an average annual amount of approximately 1600 acres since 1998. This represents a 30% reduction in the total amount of wildlife and fish habitat improvement work that has been completed annually across the ANF since the programmatic BO was issued.

There has also been a reduction in the amount of road work completed on the ANF. New road construction has dropped from an average annual of 13.7 miles between 1986 and 1997, to an annual average of 0.1 mile of new road construction per year since 1998. Road reconstruction has had a similar reduction, and road betterment has dropped from an average annual amount of 10.1 miles per year from 1986 to 1997, to an annual amount of 0.1 mile per year between 1998 and 2000. Since 1998, the average annual amount of road restoration has been 36.9 miles per year, which represents a 22% reduction in annual road restoration over what was completed between 1986 and 1997 (46.8 miles per year).

Status of the Species Within the Action Area

In 2002, mist-netting was conducted at one location within the project area. No Indiana bats were captured. However, considering the availability of forested habitat in and near the project area, the Forest Service considers the project area to be suitable, occupied Indiana bat habitat.

Approximately 91% of the 321-acre project area was determined to be suitable or optimal foraging and roosting habitat for Indiana bats. Approximately 70% of the project area currently provides optimal maternity roosting habitat, and 52% provides optimal foraging habitat (BA, p. 22).

Effects of the Action

Service analysis of the preliminary preferred alternative (Alternative 2) for the Painter Run Windthrow Salvage Project includes consideration of the assumed presence of Indiana bats and their habitat in the project area.

The Service anticipates that the proposed actions associated with the Painter Run Windthrow Salvage Project could result in the incidental take of Indiana bats through harassment, especially if project activities result in the loss of still-standing, recently-used maternity roost trees. This would force any female bats to select alternate roost trees. However, because roost trees are ephemeral, and because snags and potential roost trees occur throughout the project area, the risk of take in the form of harassment is low. Because tree removal will occur when bats are not present, no bats will be killed or injured during harvest activities.

With the exception of an estimated 25-50 hazard trees, standing trees will not be harvested. Therefore, the proposed action is not anticipated to have a significant effect on the availability or distribution of foraging or roosting habitat for Indiana bats. The percentages of optimum roosting and foraging habitat are the same pre- and post-project (BA, p. 23).

The types of timber harvest activities proposed were described on pages 7-8 of the programmatic BO. The potential direct and indirect effects to the Indiana bat from harvest or removal of trees are consistent with those identified and evaluated in the programmatic BO (pp. 46-48, 51, and 65-66), and are hereby incorporated by reference. Minimization of adverse effects will be addressed by implementation of the project-specific conservation measures, as described in the "Proposed Action" section of this opinion.

As described in the Service's programmatic BO, we believe that adverse effects are likely to occur to the Indiana bat from harvesting or tree removal under the Forest Service's management program activities. Therefore, given the nature of activities associated with the proposed project, we believe that incidental take of Indiana bats is possible within the analysis area. However, we have concluded that activities associated with the Painter Run Windthrow Salvage Project will not result in adverse effects to the Indiana bat beyond those that were previously disclosed and discussed in the Service's programmatic BO.

Cumulative Effects

Cumulative effects include the effects of future State, tribal, local, or private actions that are reasonably certain to occur in the action area considered in this biological opinion. No such cumulative effects were identified in the BA; therefore, none have been evaluated.

Conclusion

The actions and effects associated with the proposed Painter Run Windthrow Salvage Project are consistent with those identified and discussed in the Service's programmatic BO. After reviewing the size and scope of the project, the environmental baseline, the overall status of the Indiana bat, the effects of the action, and the cumulative effects, it is the Service's biological opinion that the proposed action is not likely to jeopardize the continued existence of the Indiana bat.

This project has not resulted in a jeopardy determination because: 1) the project's impacts are consistent with those identified and discussed in the programmatic BO; and 2) the Forest Service has proposed to implement a seasonal restriction on the removal of potential roost trees, thereby reducing the likelihood that Indiana bats will be killed, injured, harmed, or harassed.

Incidental Take Statement

This "Tier 2" biological opinion is based on potential adverse effects to the Indiana bat from the removal of suitable habitat during timber harvesting within the Painter Run Windthrow Salvage project area. This BO identifies the incidental take anticipated due to implementation of the Painter Run Windthrow Salvage Project (preferred alternative), and the cumulative total of incidental take which has occurred (Table 2).

Consistent with the approach taken in the programmatic BO, incidental take for this species is measured indirectly as loss or alteration of forested habitat (in acres), as outlined in Table 2. Thus, implementation of Alternative 2 could result in the take of Indiana bats, as measured by the loss/alteration of 175 acres of forested habitat over a 2-year period. This take is counted toward the cumulative annual incidental take as outlined in the programmatic BO (Table 6, p. 67).

The actual incidental take reported by the Forest Service (fiscal years 1998 through 2003), has consistently been far below the annual levels estimated (authorized) in the programmatic BO (see Table 2). Therefore, we do not anticipate that implementation of this project will cause the take levels in the programmatic BO to be exceeded.

Table 2. Actual vs. authorized incidental take (as measured indirectly by acreage) due to the removal or disturbance of potential Indiana bat habitat on the Allegheny National Forest, Pennsylvania.

Activity	Acres Actually vs. (Authorized to be) Removed/Disturbed						
	FY 1998	FY 1999	FY 2000	FY 2001	FY 2002	FY 2003	Total ¹
Trail Construction							
• Pedestrian	.3 (0)	7.8 (8)	.3 (2)	.2 (2)	0 (2)	0 (2)	8.6 (16)
• Motorized - winter	.3 (4)	3.6 (0)	0 (4)	.6 (4)	0 (4)	0 (4)	4.5 (20)
• Motorized - summer	6 (0)	1.2 (0)	3.2 (4)	2.14 (4)	0 (4)	0 (4)	12.54 (16)
Timber Management							
• Clearcut	191 (220)	222 (220)	0 (420)	59 (220)	6 (220)	0 (220)	478 (1520)
• Shelterwood seed/prep	1558 (1640)	521 (1640)	299 (4000)	395 (2000)	575 (2000)	260 (2000)	3608 (13,280)
• Shelterwood removal	1203 (1864)	573 (1864)	488 (1864)	843 (1864)	381 (1864)	268 (1864)	3756 (11,184)
• Thinning	1526 (3225)	732 (3225)	240 (7000)	659 (3225)	988 (3225)	316 (3225)	4461 (23,125)
• Selection cut	458 (334)	184 (334)	17 (700)	40 (800)	63 (800)	0 (800)	762 (3768)
Wildlife Habitat Management	10 (10)	7 (10)	4 (10)	0 (10)	0 (10)	0 (10)	21 (60)
Prescribed Burning	0 (40)	10 (40)	3 (40)	0 (40)	0 (40)	0 (40)	13 (240)
Roads							
• Construction	0 (1)	0 (0)	0 (73)	1.44 (55)	1.8 (55)	0 (55)	3.24 (239)
• Reconstruction/betterment	0 (0)	0 (0)	0 (55)	4.44 (55)	2.28 (55)	0 (55)	6.72 (220)
• Restoration	2 (2)	3 (3)	4.14 (3)	1.99 (3)	1.01 (3)	0 (3)	12.14 (17)
Oil and Gas Development	149 (149)	206 (- 112)	258.75 (- 112)	236.25 (- 112)	194.25 (- 112)	0 (- 112)	1044.25 (709)
TOTALS	5103.6 (7489)	2470.6 (7456)	1317.39 (14,287)	2243.06 (8394)	2212.34 (8394)	844 (8394)	14,191 (54,414)

¹ Total actual take (1998 through 2nd quarter of 2003) vs. authorized take (total estimated in programmatic BO)
Reasonable and Prudent Measures

The Service believes the following reasonable and prudent measures are necessary and appropriate to minimize take of the Indiana bat.

- C Ensure that suitable Indiana bat foraging and roosting habitat is retained within the project area.

Terms and Conditions

In order to be exempt from the prohibitions of section 9 of the Act, the Forest Service must comply with the following terms and conditions, which implement the reasonable and prudent measures described above, and outline reporting and monitoring requirements. These terms and conditions are non-discretionary.

- C Implement project conservation measures (as detailed on pp.15-16 of the BA; and pp. 4-5 of this BO).
- C Continue to report incidental take to the Fish and Wildlife Service quarterly.

Reinitiation Notice

In accordance with our June 1, 1999, biological opinion, and the June 1, 2000, amendment to that opinion, incidental take that occurs as a result of this and other projects on the Forest cannot exceed the annual or cumulative incidental take levels established in the programmatic biological opinion. If implementation of any project or projects is anticipated to exceed these take levels, further consultation will be necessary. To ensure that incidental take is not exceeded, quarterly reports should continue to be provided to this office tabulating the amount of incidental take (as it occurs) on projects being implemented throughout the Forest, as indirectly measured by acres affected. In addition, you should be aware that this project may be subject to further consultation pending the outcome of future consultations on the Forest Plan or Forest Plan amendments.

Should new information reveal that the agency action may affect listed species or critical habitat in a manner or to an extent not considered in this opinion; or the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in this opinion; or a new species is listed or critical habitat is designated that may be affected by the action; or the amount or extent of take as identified in Table 2 is exceeded, reinitiation of formal consultation as outlined in 50 CFR 402.16 is required.

If you have any questions regarding our response, or if you need additional information, please contact Carole Copeyon of my staff at 814-234-4090.

Sincerely,

David Densmore
Supervisor

LITERATURE CITED

- Romme, R.C., K. Tyrell and V. Brack, Jr. 1995. Literature summary and habitat suitability index model: components of summer habitat for the Indiana bat, *Myotis sodalis*. Report submitted to the Indiana Department of Natural Resources, Division of Wildlife, Bloomington, Indiana by 3D/Environmental, Cincinnati, Ohio. Federal Aid Project E-1-7, Study No. 8, 38 pp.

cc:

ANF - Kevin Elliott

Project file (CKC)

Readers file

ES file: ANF - Mini-BO

ES:PAFO:CCopeyon/ckc:ll: 6/27/03

Filename: Painter Run Windthrow Salvage MBO_062703.doc